

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MELINDA SGARIGLIA,)	
)	1:19-cv-05684
Plaintiff,)	
)	
v.)	Honorable Judge Robert W.
)	Gettleman
AMERICAN INTERNATIONAL RELOCATION)	
SERVICES, LLC, D.B.A. AIRES, AN ILLINOIS)	
LIMITED LIABILITY CORPORATION,)	
NICHOLAS GONRING & KELLY GONRING.,)	
)	
Defendants.)	

PLAINTIFF'S 2nd MOTION FOR EXTENSION OF TIME

NOW COMES the Plaintiff, Melinda Sgariglia, Inc., by and through her attorney, Carol Oshana of Oshana Law, and in support of her 2ND Motion for Extension to file Motion for Summary Judgment on damages, states as follows:

FACTS

1. On June 20, 2019, Plaintiff Melinda Sgariglia filed her Complaint for a violation of the Residential Real Property Disclosure Act, 765 ILCS 77/35, Fraud and Breach of Contract in the Circuit Court of Cook County, Chancery Division.
2. Defendants moved the matter to the United States District Court for the Northern District of Illinois, Eastern Division.
3. On January 18, 2024, this honorable Court entered an Order requiring the Plaintiff to file a Motion for Summary Judgment.
4. On March 18 2024, this honorable court gave an extension through April 15, 2024 for Plaintiff to file her Motion for Summary Judgment on damages.

5. Due to Plaintiff counsel's extensive work, including 3 trials, Counsel needs a month extension to finalize the brief.
6. Defendant will not be prejudiced by the delay and had previously indicated his agreement to extensions. Plaintiff's counsel left a voicemail and email to counsel but has not heard back yet.

WHEREFORE, for the foregoing reasons, Plaintiff, by and through her attorney, Oshana Law, respectfully requests that this Honorable Court grant the parties an extension of 30 days to file her Motion for Summary Judgment, to Friday, May 17, 2024. In addition, Plaintiff asks that the Defendants be afforded an additional 60 days thereafter to file their response, and for Plaintiff to be given 14 days to file her Reply.

Respectfully submitted,
MELINDA SGARIGLIA,

By: /s/ Carol Oshana
One of her attorneys

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April 18, 2024